

**Eighty-fifth meeting of the Standing Committee
19-20 September 2022**

Agenda item 4(c)

Oral update on integrity in UNHCR

In order to effectively deliver on its protection and solutions mandate, UNHCR has a responsibility to ensure that strong systems are in place to support organizational integrity. Working in challenging environments with a diverse and multicultural workforce, UNHCR strives to ensure an open, respectful working environment that is free from abuse, discrimination, exploitation and harassment. It also has an obligation to prevent, mitigate and respond appropriately to misconduct in all its forms. Ethical decision-making is a key element in achieving this.

Achieving this begins with understanding the risks and addressing the underlying factors rooted in organizational culture, including power differentials, gender inequalities, conscious and unconscious biases – particularly around race, age, contractual status and hierarchy. These factors and how they manifest themselves have direct implications on the working environment. To this end, UNHCR is determined to develop an organizational and workplace culture where colleagues feel safe to engage, speak up and report misconduct, and where those affected are able to receive the support they need.

UNHCR's efforts in this area are led by a range of entities, some operating as part of UNHCR's management and others operating as independent entities which may offer additional safeguards. Some of these entities form part of the United Nations system of administration of justice, with its aim of facilitating the resolution of disputes informally or formally. The focus of this oral update is primarily on the activities of UNHCR's Ethics Office, its Ombudsman and Mediator, the Senior Coordinator for the prevention from and response to sexual exploitation and abuse and sexual harassment, and the Enterprise Risk Management Service.

A risk-based approach to maintaining the organization's integrity

UNHCR's approach to risk management is guided by its "Risk Management 2025" strategy. Launched in 2021, the strategy supports colleagues to think ahead, identify and prevent problems, seize opportunities and act with integrity. It is underpinned by a behavioural change model that highlights the importance of managing cultural, ethical and integrity related risks and opportunities.

Identifying, mitigating and responding to integrity risks is an organization-wide effort. It involves first and foremost the people of the organization at all levels, with senior managers setting the example, nurturing teams and creating the environments necessary for this approach to thrive. To support these efforts, the Enterprise Risk Management Service, UNHCR's risk network (comprised of Senior Risk Advisers across regional bureaux and high-risk operations), colleagues from across the organization, and partners work together to seize opportunities and manage challenges. Together, the risk network strives to strengthen the risk management culture.

For the High Commissioner and his Senior Executive Team, the Strategic Risk Register is a critical tool that guides UNHCR's approach to risk management. It captures the most significant organization-wide risks and opportunities, and instils a culture of accountability, integrity and ethical conduct in the workforce. This tool is complemented by regular risk reviews that have enabled operations, regional bureaux and headquarters entities to identify and actively tackle integrity risks, including risks related to sexual exploitation and abuse, the integrity of asylum procedures, and potential fraud by personnel and partners.

To address risks of breaches to integrity, UNHCR operations have identified a variety of mitigation measures. These include enhanced feedback and complaints mechanisms that allow displaced communities to voice the challenges they face and UNHCR and partners to take appropriate follow-up actions. Strengthened data management and programme performance monitoring are also being employed to ensure UNHCR's programmes reach the right people and have the right impact, while detecting potential fraud.

Strengthening a healthy workplace culture

UNHCR's efforts to promote a culture of dialogue continue to be strengthened through various global networks of colleagues, including some 400 code of conduct dialogue facilitators, 400 peer advisers, 300 risk focal points and 350 focal points for the protection against sexual abuse and exploitation. These integrated networks provide support to personnel as well as an avenue for shared learning.

Strengthening organizational culture to mitigate integrity risks also requires learning from past experiences. Critically, it involves a healthy and sustained dialogue with colleagues to instil confidence in their ability to speak up, knowing that managers will listen and act.

In this vein, UNHCR adapted its Code of Conduct sessions to be more engaging and risk informed through dialogue. Employing experiential learning practices in addressing ethical dilemmas, the dialogues equip colleagues to take ethical decisions and respond to challenges with transparency and integrity, in line with UNHCR's values. In 2021, over 110 operations and offices held such sessions using adapted online materials. In 2022, these operations and offices were asked to develop their own Code of Conduct dialogue sessions, which were relevant to their operational context and which addressed the most pressing challenges and risks, using a mix of methods designed to strengthen ethics and integrity in the workplace.

As a prime example of this approach, Code of Conduct dialogue sessions brought together the operations in Libya and Tunisia, together with the Ethics Office, the Enterprise Risk Management Service and the Office of the Ombudsman and Mediator. Used as a vehicle for change to strengthen the risk management culture of the two operations, the sessions analysed life-like scenarios and covered sensitive subjects such as abuse of power, conflict management in the workplace, protection against retaliation, procurement integrity, and the prevention of fraud and corruption. With over seven sessions organized, close to 800 colleagues were reached.

The organization's senior leadership remains actively involved in nurturing dialogue and engagement on issues relating to organizational culture and values; the prevention of sexual exploitation and abuse, and sexual harassment; measures to combat the abuse of authority; workforce empowerment; and racial equality, equity and inclusion. Regular townhall meetings remain a key avenue for engagement with the workforce, providing opportunities for dialogue across the organization on new and emerging issues. These have been complemented by follow-up conversations within the Senior Management Committee, given its leadership role on these matters. The critical role of managers in identifying and proactively tackling these challenges was further highlighted through the issuance of the annual summary of the High Commissioner's decisions on disciplinary matters and cases of criminal behaviour. The dissemination of this summary encouraged managers to reflect on their own teams and on the strength and suitability of the systems in place to prevent such instances within their own operations.

Consistent with its efforts to communicate more effectively about mechanisms and recourses available to colleagues, UNHCR launched a new intranet page to support personnel with workplace concerns. The page contains a description of each of the services and entities responsible for providing support and a link where more information can be found. For colleagues who remain unclear where to go for support, there is an online form which is routed to the Ethics Office. The latter manages a collaborative referral forum of entities (referred to as the "Support Desk") for appropriate attention and resolution.

At the beginning of 2022, the point of entry into UNHCR for the Speak Up helpline was transferred from the Ethics Office to the Inspector General's Office. This change ensures that complaints, which may require protection of the complainants and which are handled by the independent Inspector General's Office, the Ethics Office or the Office of the Ombudsman and Mediator, are managed confidentially, prior to any onward submission to UNHCR management.

Further investments were also made to the Office of the Ombudsman and Mediator which provides independent, informal, confidential and impartial alternative dispute resolution services to address workplace disputes, grievances and conflicts. This Office, which has seen a 166 per cent increase in requests for support between 2017 to 2020, provides colleagues with an important alternative to formal mechanisms. Through informal resolution at earlier stages of workplace conflicts, it promotes a culture of resolving differences through constructive dialogue and help support all personnel, including managers, to constructively address disagreements before they escalate to serious conflict.

In the course of the year, a new Ombudsman and Mediator was recruited, bringing in extensive experience in field and operational settings within the United Nations system. Under the new leadership, two newly created positions were established in the Regional Bureau for the East and Horn of Africa and Great Lakes to help better serve UNHCR's decentralized workforce.

Ensuring a victim-centred approach and a culture of confidence

Ensuring that the needs of victims and survivors of sexual harassment is a central and guiding principle in prevention and response efforts has remained a critical element of UNHCR's work to tackle all forms of exploitation, abuse and harassment. Building on the issuance of a policy on a victim-centred approach in 2020, UNHCR continued to operationalize the policy through a range of actions. These included specialist training for investigators of sexual misconduct, including trauma sensitive interviewing techniques; case study reviews using a victim-centred approach to identify lessons learned; and multi-lingual e-learning and regional capacity-building workshops aimed at enhancing the capacity of UNHCR and partner personnel to handle and investigate allegations of sexual misconduct.

In parallel, the organization has expanded and transformed broader learning activities, with a renewed pedagogical approach that attempts to look at the underlying causes of sexual misconduct, encourage empathy with victims and promote a victim-centred response. Specialist training on the prevention of sexual exploitation and abuse, and sexual harassment has been complemented by the integration of related content in other organizational learning initiatives, including training on emergencies, coordination, senior leadership, and security. This approach has ensured that over a thousand UNHCR personnel were provided with training since 2021. Focal points for the prevention of sexual exploitation and abuse, and sexual harassment have also benefited from experiential learning methodologies that encourage reflection and understanding of the root causes and enhance awareness in identifying, preventing, and responding to sexual misconduct.

To ensure dedicated capacity in this area, a Victim Care Officer provides confidential support and guidance to victims and survivors, and provides advice to managers. In 2021, the Victim Care Officer provided psychosocial support to 54 victims of sexual harassment, ensuring that they and witnesses were accompanied through difficult processes. The utilization of a Victim Care Officer builds confidence in reporting and is seen as a best practice in the United Nations system and among members of the Inter-Agency Standing Committee.

In an effort to further instil confidence in grievance processes, a revised administrative instruction on protection against retaliation (whistle-blower policy) came into force in mid-2022. The revised policy ensures that UNHCR's procedures for ensuring protection against retaliation fully benefit from the Inspector General's investigative expertise through preliminary reviews of requests for protection against retaliation. It also seeks to avoid duplication and allows the Ethics Office to concentrate on preventative measures and the promotion of a speak-up culture in the organization. The revised policy also ensures that the protection needs of victims of sexual harassment are addressed, in line with UNHCR's policy on a victim centred approach.

These changes build on UNHCR's framework for protection against retaliation. Under the framework, the Ethics Office responded to some 177 retaliation related enquiries (57 of which involved engagement in a protected activity and 26 of which were formal requests for protection against retaliation) between September 2018 and July 2022. Of the 26 formal requests for protection against retaliation received to date, 3 cases were substantiated and led to the implementation of protective action for concerned personnel and 11 are currently open and being actively managed.

Inter-agency engagement on the fight against sexual misconduct

Recognizing that the fight against sexual misconduct is a collective responsibility and endeavour, UNHCR has continued to contribute towards interagency efforts in this respect. It works on these issues within the Inter-Agency Standing Committee, as well as in close cooperation with the offices of the United Nations Special Coordinator for Addressing Sexual Exploitation and Abuse, and the United Nations Victims' Rights Advocate. Dedicated and specialized missions have been undertaken with both offices to the Ukraine emergency and to the Kakuma refugee camp in Kenya, respectively. UNHCR has also continued its close engagement with the United Nations Chief Executives Board Task Force on Addressing Sexual Harassment, chaired by UNHCR's Deputy High Commissioner, with UNHCR co-leading its Workstream on Leadership and Culture, together with the World Food Programme.

Through its engagement in the Inter-Agency Standing Committee, UNHCR contributes operational expertise and guidance to system-wide policy development, including in this area. In 2021, lessons identified through UNHCR's extensive field presence helped inform the independent review on the prevention of sexual exploitation and abuse, and sexual harassment, which was conducted by the United Nations Population Fund as Champion of the Inter-Agency Standing Committee. Subsequently, UNHCR contributed to the development of a strategy and workplan, and is currently helping to establish a system-wide definition of a victim-centred approach, for which UNHCR's Victim Care Officer is a key resource person.

UNHCR works closely with over 1,000 governmental and non-governmental partners as key allies to prevent and respond to integrity risks. Training programmes developed by UNHCR aim to provide partners with reinforced capacity. This includes regular training provided to partners in high-risk operations with a focus on abuse of authority, the prevention of fraud corruption, and the prevention of sexual exploitation and abuse. Multi-lingual webinars are used to promote greater understanding around the role of risk management in helping the organization better deliver on these objectives and e-learning programmes are helping enhance partner investigative capacity on the prevention of sexual exploitation and abuse. The use of a system-wide tool to assess implementing partners for compliance with the United Nations Protocol on Allegations of Sexual Exploitation and Abuse provides UNHCR with a further opportunity to support and strengthen the capacity of its partners to prevent and respond to sexual exploitation and abuse, as and when challenges are identified.

UNHCR has worked to ensure that considerations related to the prevention of sexual exploitation and abuse are mainstreamed in the organization's approach to emergency response and coordination activities. For example, at the onset of the Ukraine emergency response, coordinators tasked with activities aimed at preventing sexual exploitation and abuse were deployed to four countries neighbouring Ukraine. They helped ensure that the prevention of sexual exploitation and abuse was embedded in the foundations of the response under the refugee coordination model. Under the leadership of these coordinators, humanitarian organizations were able to carry out risk assessments, identify and strengthen feedback and reporting mechanisms, establish referral pathways, and ensure a coordinated and harmonized approach across all sectors to mitigate and respond to risks associated with sexual misconduct.

While progress has been made, much remains to be done in UNHCR and the broader humanitarian community to further strengthen integrity further. In the constantly changing and challenging operational environments in which UNHCR works, addressing integrity risks will remain a key priority. UNHCR is committed to staying the course to prevent and respond to misconduct in all its forms, and to ensure that its operations promote a respectful working environment free from abuse, discrimination and exploitation – and one that stays true to its mandate.
